

# **WISCONSIN LEGISLATIVE COUNCIL STAFF**

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 96-060**

### **Comments**

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]**

### **2. Form, Style and Placement in Administrative Code**

To correspond to usual drafting practices:

a. The period at the end of the first sentence of s. PI 3.18 (intro.) should be stricken and the period at the end of the second sentence of that paragraph restored. [See s. 1.06 (4), Manual.]

b. In s. PI 3.18 (7) (b), “persons” should be replaced by “a person” and “they have” should be replaced by “he or she has”. This change would also be consistent with existing provisions of s. PI 3.18.

c. Throughout the rule, periods should follow subdivision numbers [e.g., “subd. 1.” or s. PI 3.05 (7) (b) 2.”]. [See s. 1.03 (5) and (6), Manual.]

d. The references to “(title)” should be deleted from the subsection numbers of the provisions affected by SECTION 9 of the rule. These references are included only when the title is being amended. Also, in SECTION 6, the title to sub. (8) should be deleted from the provision as recreated because the title is not repealed by the rule, and the reference to “(title)” should be deleted from the subsection number of the provision that is repealed and recreated. [See s. 1.05 (3) (d), Manual.]

#### **4. Adequacy of References to Related Statutes, Rules and Forms**

a. The references to “s. PI 3.05 (7) (b)” and “this subsection” in s. PI 3.05 (7) (b) 2., as amended by the rule, should be replaced by references to “~~s. PI 3.05 (7) (b)~~ subd. 1.” and “subd. 1.”, respectively.

b. The reference to “subd. 1” in s. PI 3.18 (7) (b) should be replaced by a reference to “par. (a) 1.”.

For guidance on the format for internal cross-references, see s. 1.07 (2), Manual.

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. The following changes to the analysis would help clarify the rule and its effects:

- (1) In the first bulleted item in the analysis, a reference should be included to s. PI 4.06 (6) (a) 4., which provides the exemption for in-state applicants by authorizing an approved professional education program to grant exceptions to the established passing scores on the examinations for admission to its professional education programs for no more than 10% of the total number of students admitted. Also, the analysis should indicate the relationship of ch. PI 3 to ch. PI 4 and the relationship of the examinations given under s. PI 4.06 (6) (a) 4. to the one given under s. PI 3.05 (7) (b).
- (2) The second bulleted item should be reworded to state that the rule allows certain licensure requirements (rather than deficiencies) to be met through approved equivalency clock hour programs. Also, the analysis should indicate that this is accomplished by replacing requirements for “completed course work” with requirements for “preparation.”
- (3) To be consistent with the terminology used in the text of the rule, in the fourth bulleted item, “social science” should be substituted for “social studies.”
- (4) For each bulleted item, a reference should be included to the corresponding SECTIONS of the rule. Although not usually necessary, given the number of topics covered by this rule and the complexity of ch. PI 3, the inclusion of SECTION numbers would be particularly helpful for this analysis.
- (5) Descriptions should be included of: (a) the proposed 20% requirement in s. PI 3.05 (7) (b) 2.; (b) the title change in s. PI 3.18 (3); and (c) the changes to art and physical education licenses in s. PI 3.21 (2) and (10).

b. Why is “a” changed to “the” in s. PI 3.56 (1)? There is more than one principal license.